

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAMON REYES, JR.,

Defendant.

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NO. 3:19-CR-033-L

UNOPPOSED MOTION FOR FAMILY VISITATION

Defendant, **RAMON REYES, JR.**, by his appointed counsel, Assistant Federal Public Defender Michael Kawi, hereby moves this Court for an order allowing specified family members reasonable, supervised visitation with Mr. Reyes while he recovers in the hospital. In support of this request, counsel states the following:

1. After being found unresponsive in his cell at Mansfield Law Enforcement Center ("MLEC") on February 26, 2019, Mr. Reyes was taken to a nearby hospital, where it was confirmed that he had a major brain bleed, which required immediate surgery.
2. Mr. Reyes survived the surgery, and is currently in a medically induced coma. There is not currently a projected timeline for bringing him out of sedation or his eventual release from the hospital. Further, there is no current prognosis for his condition should he be successfully brought out from under sedation.
3. Mr. Reyes' family members are seeking an order allowing them reasonable daily visitation while Mr. Reyes is hospitalized. The family members seeking visitation are: Maria Reyes (DOB 1/14/1947), his mother; Jeanette Reyes (DOB 3/29/1978) and Alyssa Reyes (DOB 3/9/1993), his adult sisters; and Juana McKenzie (DOB 2/8/1951), his aunt. They have all previously been approved for visits at MLEC.
4. The government is not opposed to this request.

WHEREFORE, Defendant requests that the Court order such visitation be allowed.

Respectfully submitted,

JASON D. HAWKINS
Federal Public Defender
Northern District of Texas

/s/ Marti R. Morgan

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CERTIFICATE OF CONFERENCE

I certify that on February 26, 2019, I conferred with AUSA Camille Sparks and confirmed that the government is not opposed to this request.

/s/ Marti R. Morgan

MARTI R. MORGAN

CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2019, I electronically filed the foregoing document using the Court's CM/ECF system, thereby providing service on attorneys of record.

/s/ Marti R. Morgan

MARTI R. MORGAN